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Rochester, New York 14646-0700

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Michael J. Shortley, III
Senior Corporate Attorney

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RochesterTel

BY SPECIAL MESSENGER

December 19, 1991

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20554

RE: DA 91-1307 - In the Matter of Administration of the
North American Numbering Plan

Dear Ms. Searcy:

Enclosed for filing please find an original plus nine (9) copies of the Comments of Rochester Telephone Corporation in the above-captioned proceeding.

Please date-stamp the enclosed photocopy of this letter indicating receipt and return it to the undersigned in the self-addressed postpaid return envelope provided.

Very truly yours,

Michael J. Shortley, III

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MJS/ld
Enclosure
(1589K)

cc: Downtown Copy Center
Mary Green, Industry Analysis Division

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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DA 91-1307

In the Matter of
Administration of the North
American Numbering Plan

COMMENTS OF
ROCHESTER TELEPHONE CORPORATION

JOSEPHINE S. TRUBEK
General Counsel
Rochester Telephone Corporation
180 South Clinton Avenue
Rochester, New York 14646
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Michael J. Shortley, III
of Counsel

December 19, 1991

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Administration of the North
American Numbering Plan

DA 91-1307

COMMENTS OF
ROCHESTER TELEPHONE CORPORATION

Rochester Telephone Corporation ("Rochester"), on its behalf and that of its exchange carrier subsidiaries,^{1/} submits these comments in response to the Commission's Public

^{1/} AuSable Valley Telephone Company, Inc., Breezewood Telephone Company, C, C & S Telco, Inc., Canton Telephone Company, Citizens Telephone Company, DePue Telephone Company, Enterprise Telephone Company, Fairmount Telephone Company, Inc., Highland Telephone Company, Inland Telephone Company, Lakeshore Telephone Company, Lakeside Telephone Company, Lakewood Telephone Company, Lamar County Telephone Company, Inc., Midland Telephone Company, Mid-South Telephone Company, Inc., Midway Telephone Company, Minot Telephone Company, Mondovi Telephone Company, Monroeville Telephone Company, Inc., Mt. Pulaski Telephone & Electric Company, Ontonagon County Telephone Company, Orion Telephone Exchange Association, Oswayo River Telephone Company, Prairie Telephone Company, S & A Telephone Company, Inc., The Schuyler Telephone Company, Seneca-Gorham Telephone Corporation, Southland Telephone Company, St. Croix Telephone Company, Sylvan Lake Telephone Company, Inc., The Thorntown Telephone Company, Inc., Urban Telephone Corporation, Viroqua Telephone Company, Vista Telephone Company of Iowa and Vista Telephone Company of Minnesota.

Notice^{2/} requesting comment on the petition of the National Association of Regulatory Utility Commissioners ("NARUC") that the Commission commence a proceeding regarding the administration of the North American Numbering Plan.^{3/} NARUC raises several concerns that this Commission may wish to address. The telecommunications industry is now facing a shortage of several types of codes that are used to route telephone calls today, including area codes and carrier identification codes. This pending code exhaustion might require the industry to expend resources to develop and implement solutions to these problems. The chosen solutions could also affect dialing patterns that may be needed to accommodate a new numbering plan. In addition, the Commission may wish to address the numbering plan implications of the Commission's recent inquiries regarding Personal Communications Services and Video Dial Tone.^{4/}

^{2/} DA 91-1307, National Association of Regulatory Utility Commissioners Seeks Notice of Inquiry Addressing Administration of the North American Numbering Plan, Mimeo 20265 (Oct. 18, 1991).

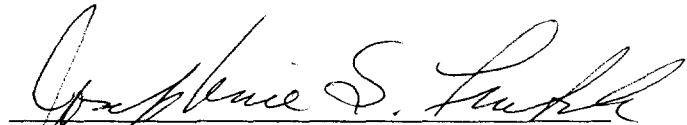
^{3/} National Association of Regulatory Utility Commissioners' Petition for Notice of Inquiry Addressing Administration of the North American Numbering Plan (Sept. 26, 1991).

^{4/} Amendment of the Commission's Rules To Establish New Personal Communications Services, Gen. Dkt. 90-314, Policy Statement and Order, FCC 91-338 (released Oct. 25, 1991); Telephone Company-Cable Television Cross-Ownership Rules, Sections 63.54-63.58, CC Dkt. 87-266, Further Notice of Proposed Rulemaking, First Report and Order and Second Further Notice of Inquiry, FCC 91-334 (released Nov. 22, 1991).

Because of the significance of the issues involved, the Commission should satisfy itself that the solutions that are adopted reasonably balance the needs of all participants in the industry. Thus, the Commission should, as requested by NARUC, issue a Notice of Inquiry to consider how best to address these concerns. In addition, the Commission should consider whether a uniform, nationwide solution is required. Uniformity may be desirable, for example, to avoid having callers in different parts of the country face different dialing patterns for the same type of call.

For the foregoing reasons, the Commission should grant NARUC's petition and issue a Notice of Inquiry to address the issues presented by the changes in the North American Numbering Plan that may be required in light of developments in the telecommunications industry as set forth herein.

Respectfully submitted,



JOSEPHINE S. TRUBEK
General Counsel

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Michael J. Shortley, III
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